

# Exhibit 3

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF THE NEW YORK

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MIRANDA ISABEL CATABOIS,

Index No. 101243/2023

Plaintiff,

-against-

**AFFIDAVIT OF MERIT**

GEORGE T. PETERS, LAW OFFICE OF PETERS &  
ASSOCIATES, LAW OFFICE OF GEORGE T.  
PETERS, PLLC, BERKELEY EDUCATIONAL  
SERVICES OF NEW YORK, INC. d/b/a BERKELEY  
COLLEGE,

Defendants.

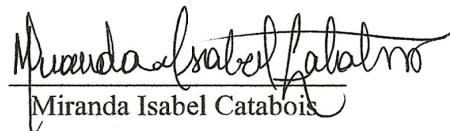
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STATE OF NEW YORK )  
 ) SS.  
COUNTY OF KINGS )

Miranda Isabel Catabois, being duly sworn, states the following under penalty of perjury:

1. I am Plaintiff in the above-captioned matter.
2. I submit this Affidavit in support of the motion for default judgment against George T. Peters, Law Office of Peters & Associates and Law Office of George T. Peters, PLLC (hereinafter collectively referred to as "Defendant Peters").
3. In 2011, I was enrolled as a student at Berkeley College, pursuing an Associate Degree in Paralegal Studies.
4. In January 2012, Berkeley College placed me in an internship for school credit with attorney Defendant Peters.
5. In or about January 2012, Defendant Peters kept me at the office late where he forcefully grabbed my breasts repeatedly and put his hand down my pants and touched my vagina, despite my repeated physical resistance and verbal protests.

6. I did not consent to sexual contact of any kind with Defendant Peters.
7. Due to anxiety and my unprocessed trauma and no guidance from Berkeley College, I stopped attending an internship, which I needed to graduate.
8. I dropped out of school due to anxiety and fear about attending another internship.
9. Due to the emotional distress, I have been severely depressed, and anxious and I suffer from symptoms of post-traumatic stress disorder. In addition, I have difficulty working with men in the workplace and I am extremely hypervigilant around men at work. I have been unable to adjust to life since the sexual assaults and I feel immense hopelessness and loss of direction and purpose in life.



Miranda Isabel Catabois

Sworn to before me this

26<sup>th</sup> day of September, 2024.  
Ronald Elcock

Notary Public

**RONALD ELCOCK**  
Notary Public, State of New York  
NO. 01EL6409978  
Qualified in Kings County  
Commission Expires 10/13/2024